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Comments to ARRL Proposed modification to RM-11306

I do not support the proposed latest revision by the ARRL to RM-11306 presented to the FCC on 13 February, 2007; see my comments filed on 2-2-2006 with respect to the original RM-11306 and the comments related to the revised RM-11306 below.

Specific comments to the revised ARRL rule changes follow:

Section 97.3(a)(8) Bandwidth:

The ARRL proposes to use the necessary bandwidth definition (section 2.1) for amateur operation, rather than an occupied bandwidth as was previously used in Part 97. This definition may be too vague for the majority of amateurs to understand or be able to quantify. Under what conditions is the necessary bandwidth going to be calculated? Should there be a table of "standard" necessary bandwidths for the common modes that are used by amateurs? Although there is no mention of "standard" bandwidths in the modified ARRL proposal, the original RM-11306 contained a 3.5 kHz recommended necessary bandwidth for SSB and digital "standard" on the HF bands, except on 60 meters where a 2.8 kHz standard is used. The revised proposal has apparently changed the necessary bandwidth to 3 kHz on the HF bands. I do not believe that the ARRL has made a compelling, or, in fact, any argument to have a different standard on the HF bands (60 meters and other HF bands). The current 2.8 kHz standard for emissions in the 60 meter band should be acceptable on the other HF amateur frequency bands.

Section 97.3(a)(42) Spurious Emission:

The ARRL proposal adds the wording that the spurious emissions apparently only apply to out of the allocated amateur frequency band rather than the necessary bandwidth as required in the current FCC rules. This would imply that as long as the spurious emissions are inside of the amateur bands, then any level of spurious emission is acceptable. For interference between amateur stations in close proximity this may be a serious problem.

Section 97.119 Station Identification:

By only requiring that identification be done by the same emission type as the communication, there will be a problem for stations that cannot receive the same communications type to identify interfering stations. Suggest that identification be required every 10 minutes, using some "standard" type of modulation (CW, SSB, standard RTTY codes, etc), as is currently required in the FCC rules.

Section 97.221: Unattended automatically controlled RTTY or data emissions:

I do not support the use of unattended stations, whether RTTY or data emissions on the HF bands. There are already too many cases of interference from unattended stations starting up over existing conversations using other narrowband modes. The proposed wording will allow "cross frequency" or "cross banding" of the unattended automatically controlled station transmitter with NO REQUIREMENT to listen on the unattended station transmit frequency.

Section 97.305: Authorized emission types:

Section (b) I suggest that there should be a time limit on the test transmissions.

Section (e) Regarding the 3.5-4.0 MHz band, where there is no specific frequency specified for RTTY and data as is on other bands, the proposed ARRL table shows RTTY and data across 80 meters, while phone and image operate in the 75 meter band. With the latest FCC rules allowing phone operation from 3.6-4.0 MHz, this table is erroneous or an attempt to negate the phone band expansion in the 3.5-4.0 MHz band. I suggest that the frequency ranges for each mode/band segment be specified in MHz.

Section 97.307 Emission Standards:

Section 97.307(f)(3): The bandwidth of 3 kHz is inconsistent with the original ARRL RM-11306 proposal. Has the bandwidth proposed for data been reduced to 3 kHz, vice 3.5 kHz as in the original proposal? Is the ARRL now asking for the necessary bandwidth of voice, image, and digital emissions to be 3 kHz vice the originally asked for 3.5 kHz?

Section 97.307(f)(6): The spurious emission requirements called out in this section are in terms of so many dB down from the mean power of the fundamental emission. This seems to contradict the idea of the ARRL proposed revision of section 97.3(a)(42) where there is no mention of an absolute level of 43 dB down from the fundamental emission.

Section 97.309 RTTY and data emission codes:

Section 97.309(a): I suggest that the word “published” be replaced with “documented publically” as the original FCC section was worded, to ensure that the codes are available to the amateur community.

In closing, I would strongly recommend that the FCC reject the revised proposed RM-11306 as is currently written.